Janel Hau

From: Jennifer Miller <J.Miller@forestandbird.org.nz>
Sent: Monday, 9 June 2014 5:52 p.m.
Subject: Forest and Bird V1 pLWRP further submissions .docx
Attachments: Selwyn Te Waihora further submissions .docx

Categories: Purple Category

Further Submission on the Proposed Variation 1 to the Canterbury Land and Water Regional Plan

Forest and Bird (the Society)
P O Box 2516
Christchurch
Attention Jennifer Miller
J.miller@forestandbird.org.nz
Ph 021 651 778

Introduction

The following is an appraise of reasons why a submission is opposed or supported by the Society. There maybe other submissions that have sought similar relief that have not been commented on, in such an instance the position of the Society would be the same as those it has further submitted.

Submitter	Sub No/Point	Support/ Oppose	Reason
Central Plains Water Limited			
	11.4.12	Oppose	The amendment seeks to undermine the intent of the Variation and the importance of reducing contaminants. Fails to give proper effect to part 2 RMA and the NPS on Freshwater.
	11.4.13	Oppose	The amendment seeks to delay the reduction in N and P loss and fails to give proper effect to part 2 RMA and NPS Freshwater
	Section 11	Oppose	The amendment seeks to undermine the intent of the Policies and Rules in the Variation and is inconsistent with Part 2 RMA.
Dairy NZ	11.4.1	Oppose	The amendment seeks to undermine the intent of the Policies and Rules in the Variation and is inconsistent with Part 2 RMA.
	11.4.12(d)	Oppose	There is no reason why drains less than 1 metre should be exempt from the rule. As submitted in Forest and Bird's original submission (any) drains are part of the waterway network and can contribute to the degradation of water quality if not properly managed.
	11.4.13	Oppose	The proposed amendment provides no certainty. Council would be failing in its

			responsibilities as set out in the RMA.
Submitter	**Sub No/Point**	**Support/ Oppose**	**Reason**
Dairy NZ	11.4.14	Oppose	The proposed amendment provides no certainty. Council would be failing in its responsibilities as set out in the RMA.
	11.4.15		The proposed amendment provides no certainty. Council would be failing in its responsibilities as set out in the RMA.
	11.4.17(b)	Oppose	The proposed amendment provides no certainty. Council would be failing in its responsibilities as set out in the RMA.
	Table 11 (c)	Oppose	Contrary to Part 2 RMA
	11.4.32	Oppose	The amendment seeks to undermine the intent of the Variation and fails to give proper effect to Part 2 RMA.
	11.5.21	Oppose	The rule as currently worded is clear and the amendment does not provide any certainty.
	11.5.28	Oppose	The rule as currently worded is clear and the amendment does not provide any certainty.
Director General of Conservation			
	Table 11 (n)	Support	Gives proper effect to Part 2 RMA
Ellesmere Irrigation Society Inc			
	11.5.32	Oppose	The amendment seeks to undermine the intent of the Variation and fails to give proper effect to Part 2 RMA.
	11.5.34	Oppose	The amendment seeks to undermine the intent of the Variation and fails to give proper effect to Part 2 RMA.

	11.5.35	Oppose	The amendment seeks to undermine the intent of the Variation and fails to give proper effect to Part 2 RMA.
Submitter	**Sub No/Point**	**Support/ Oppose**	**Reason**
Ellesmere Irrigation Society Inc	11.5.36	Oppose	The amendment seeks to undermine the intent of the Variation and fails to give proper effect to Part 2 RMA.
	11.5.39	Oppose	The amendment seeks to undermine the intent of the Variation and fails to give proper effect to Part 2 RMA.
	Table 11(n)	Oppose	The amendment seeks to undermine the intent of the Variation and fails to give proper effect to Part 2 RMA.
	Table 11(k)	Oppose	The deletion of waterbodies is not supported. It fails to give proper effect to Part 2 RMA and undermine the intent of the Policies and Rules in the Variation.
	Table 11 (l)	Oppose	It fails to give proper effect to Part 2 RMA and undermine the intent of the Policies and Rules in the Variation.
Fish and Game Council North Canterbury			
	11.4.6	Support	Gives proper effect to Part 2 RMA and NPS Freshwater
	11.4.7	Support	Gives proper effect to Part 2 RMA and NPS Freshwater
	11.4.8	Support	Gives proper effect to Part 2 RMA and NPS Freshwater
	11.4.9	Support	Gives proper effect to Part 2 RMA and NPS Freshwater
	11.4.28	Support	The proposed amendment is necessary to ensure Council's responsibilities are met under the RMA and CRPS.
Fonterra Co Operative Group Ltd	11.1(a)	Oppose	The provision as set out in the pLWRP 2.1 should apply
	11.4.12	Oppose	The provision as set out in the pLWRP 2.1 should apply
	11.4.23	Oppose	Does not give proper effect to Part 2 RMA
	11.4.22	Oppose	The rule as currently worded is clear and the amendment is not helpful. Undermines the

			overall intent of the Variation.
	11.5.6	Oppose	The provision as set out in the pLWRP 2.1 should apply
	11.4.28	Oppose	The amendment provides no certainty and fails to give effect to Part 2 RMA
	Section 11	Oppose	The amendments seek to give undue weight to agriculture in the future this fails to properly consider Part 2 RMA and the NPS on Freshwater. It seeks to undermine the intent of the Variation.
	11.4.4	Oppose	The amendments seek to give undue weight to agriculture in the future. This fails to properly consider Part 2 RMA and the NPS on Freshwater. It seeks to undermine the intent of the Variation.
Submitter	**Sub No/Point**	**Support/ Oppose**	**Reason**
	11.4.14		The amendment attempts to give undue weight to agriculture in the future. This fails to properly consider Part 2 RMA and the NPS on Freshwater. It seeks to undermine the intent of the Variation.
	11.5.28		The amendment attempts to give undue weight to agriculture in the future. This fails to properly consider Part 2 RMA and the NPS on Freshwater. It seeks to undermine the intent of the Variation.
	11.5.9	Oppose	The provision as set out in the pLWRP 2.1 should apply
	11.5.10	Oppose	The provision as set out in the pLWRP 2.1 should apply
	11.5.13	Oppose	The provision as set out in the pLWRP 2.1 should apply
	11.5. 7	Oppose	The provision as set out in the pLWRP 2.1 should apply
	11.5.8	Oppose	The provision as set out in the pLWRP 2.1 should apply
	Table 11(k)	Oppose	The amendment fails to give effect to Part 2 RMA
	Table 11(l)	Oppose	The amendment fails to give effect to Part 2 RMA
Nga Runanga and Te Runanga o Ngai Tahu			
	Section 11 new objective	Oppose	The amendment seeks to give added and undue weight to economic prosperity and assumes a broad approach that may not necessarily give effect to Part 2 RMA and NPS Freshwater.

North Canterbury Province of Federated Farmers Inc			
	11.4.13	Oppose	The amendment fails to consider the impact of N loss in vulnerable soils. Fails to give effect to Part 2 RMA and the NPS Freshwater.
	11.4.14	Oppose	The amendment attempts to simply rely on FMP's and fails to give proper effect to Part 2 RMA
	11.4.15	Oppose	Amendment attempts to undermine the intent of the Variation and fails to give proper effect to Part 2 RMA
	11.4.16	Oppose	Amendment attempts to undermine the intent of the Variation and fails to give proper effect to Part 2 RMA
	11.5.8	Oppose	Amendment seeks to increase N load on vulnerable soils.
	11.5.6	Oppose	Amendment seeks to increase N load on vulnerable soils.
	11.5.7	Oppose	Amendment seeks to increase N load on vulnerable soils.
	11.5.21	Oppose	Fails to give effect to Part 2 RMA
	11.1 a	Oppose	Undermines the intention of the rule and fails to give proper effect to Part 2 RMA.